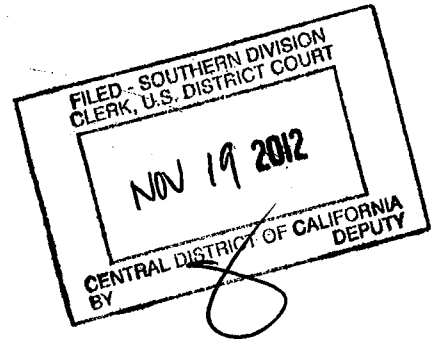


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Attorneys for Plaintiff
James R. Glidewell Dental Ceramics, Inc.
d/b/a Glidewell Laboratories

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

JAMES R. GLIDEWELL DENTAL
CERAMICS, INC.,

Plaintiff,

KEATING DENTAL ARTS, INC.,

Defendant.

Case No. SACV11-01309-DOC(ANx)

**DECLARATION OF SEEPAN
PARSEGHIAN IN SUPPORT OF
PLAINTIFF'S *EX PARTE*
APPLICATION TO FILE CERTAIN
DOCUMENTS UNDER SEAL IN
SUPPORT OF JAMES R.
GLIDEWELL DENTAL CERAMICS,
INC.'S MOTIONS FOR SUMMARY
JUDGMENT**

Ctrm: 9D, Hon. David O. Carter

Pre-Trial Conf.: January 28, 2013
Jury Trial: February 26, 2013

AND RELATED
COUNTERCLAIMS.

Snell & Wilmer LLP

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13012 NOV 19 PM 3:22

CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
SANTA ANA

ORIGINAL

1 I, Seepan Parseghian, declare:

2 1. I am an attorney licensed to practice law in the State of California and
3 am an associate in the law firm of Snell & Wilmer L.L.P., counsel for Plaintiff
4 James R. Glidewell Dental Ceramics, Inc. ("Plaintiff") in the above-entitled action.
5 I have first-hand, personal knowledge of the facts stated herein and, if called to
6 testify, could and would competently testify to those facts.

7 2. This declaration is submitted in support of Plaintiff's *Ex Parte*
8 Application to File Under Seal Certain Documents in Support of James R.
9 Glidewell Dental Ceramics, Inc.'s Motions for Summary Judgment.

10 3. Pursuant to Local Rule 7-19, I corresponded with Defendant's counsel,
11 Ms. Lynda J. Zadra-Symes, by electronic mail on November 19, 2012, explaining
12 that Plaintiff intended to file this *Ex Parte* Application to have the documents
13 identified as the Lodged Documents in the *Ex Parte* Application filed under seal.
14 On November 19, 2012, Defendant's counsel, Ms. Lynda J. Zadra-Symes, replied
15 by electronic mail to note that Defendant does not oppose this *Ex Parte*
16 Application.

17 4. The documents identified as the Lodged Documents in the *Ex Parte*
18 Application, attached hereto, contain discovery material designated "Confidential"
19 and "Attorney's Eyes Only," in accordance with the Court's January 30, 2012
20 Protective Order. Dkt. #19.

21 5. The documents identified as the Lodged Documents in the *Ex parte*
22 Application, attached hereto, contain confidential information relating to Plaintiff's
23 and/or Defendant's business development, marketing strategies, trade secrets, and
24 other confidential and proprietary information that, if disclosed to competitors,
25 could cause Plaintiff and/or Defendant substantial harm. Also, because the Lodged
26 Documents contain information relating to Plaintiff's and/or Defendant's business
27 development, marketing strategies, trade secrets, and other confidential and
28 proprietary information, disclosure could result in misuse by unscrupulous third

Snell & Wilmer

LLP
LAW OFFICES
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Los Angeles, California 90071
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1 parties and competitors by replicating valuable aspects of the BruxZir brand crown,
2 and could compromise Plaintiff's and/or Defendant's bargaining position in future
3 business negotiations.

4 6. The documents identified as the Lodged Documents of the *Ex Parte*
5 application, attached hereto, are necessary to support Plaintiff's Motions for
6 Summary Judgment.

7 I declare under penalty of perjury under the laws of the United States of
8 America that the foregoing is true and correct.

9 Executed on November 19, 2012, at Los Angeles, California.

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11 
12 Seepan Parseghian

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DECLARATION OF SEEPAN PARSEGHIAN ISO
PLAINTIFF'S *EX PARTE* APPLICATION TO FILE UNDER
SEAL

Glidewell Laboratories v. Keating Dental Arts, Inc.
U.S. District Court, Central District of California, Case No. SACV11-01309-DOC (ANx)

PROOF OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 600 Anton Boulevard, Suite 1400, Costa Mesa, CA 92626-7689.

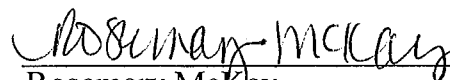
On November 19, 2012, I served, in the manner indicated below, the foregoing document(s) described as **DECLARATION OF SEEPAN PARSEGHIAN IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION TO FILE CERTAIN DOCUMENTS UNDER SEAL IN SUPPORT OF JAMES R. GLIDEWELL DENTAL CERAMICS, INC.'S MOTIONS FOR SUMMARY JUDGMENT** on the interested parties in this action by placing true copies thereof, enclosed in sealed envelopes, at Costa Mesa, addressed as follows:

Please see attached Service List

- ☐ BY REGULAR MAIL: I caused such envelopes to be deposited in the United States mail at Costa Mesa, California, with postage thereon fully prepaid. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with the United States Postal Service each day and that practice was followed in the ordinary course of business for the service herein attested to (C.C.P. § 1013(a)).
- ☐ BY FACSIMILE: (C.C.P. § 1013(e)(f)).
- ☐ BY OVERNIGHT DELIVERY: I caused such envelopes to be delivered by air courier, with next day service, to the offices of the addressees. (C.C.P. § 1013(c)(d)).
- ☒ BY PERSONAL SERVICE: I caused such envelopes to be delivered by hand to the offices of the addressees. (C.C.P. § 1011(a)(b)).
- ☐ BY ELECTRONIC MAIL: I caused such document(s) to be delivered electronically to the following email address(es): David G. Jankowski david.jankowski@kmob.com, Jeffrey L. Van Hoosear Jeffrey.vanhoosear@kmob.com, Lynda J. Zadra-Symes Lynda.zadra-symes@kmob.com, litigation@kmob.com; Thomas L. Gourde tgourdela@cox.net

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 19, 2012, at Costa Mesa, California.


Rosemary McKay

PROOF OF SERVICE

1 *Glidewell Laboratories v. Keating Dental Arts, Inc.*
2 U.S. District Court, Central District of California, Case No. SACV11-01309-DOC (ANX)

3 **SERVICE LIST**

4 David G. Jankowski
5 Jeffrey L. Van Hoosear
6 Lynda J Zadra-Symes
7 Knobbe Martens Olson and Bear LLP
8 2040 Main Street, 14th Floor
9 Irvine, CA 92614

**Attorneys for Defendant Keating
Dental Arts, Inc.**

Tel: (949) 760-0404
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David.jankowski@kmob.com
Lynda.zadra-symes@kmob.com
litigation@kmob.com

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